



TENNESSEE

REAL ESTATE APPRAISER REPORT

REAL ESTATE APPRAISER COMMISSION

TENNESSEE DEPARTMENT OF COMMERCE & INSURANCE

Vol. 11 No. 1

Chairman's Report



By Gary Standifer

There have been many questions about the experience review process and the complaint process within the Real Estate Appraiser Commission. I will try to provide some insight into both of these processes.

When an experience interview application is processed, Ms. Sandy Moore chooses three to five reports from the log to be sent in for review by a member (or members). These reports are picked at random. I would suggest that any reports (no more than three) an applicant feels are good examples of their work product that they would like for the Commission to consider be brought to the interview process in addition to the reports requested by Ms. Moore.

The reports are distributed to no more than two commission members prior to the meeting so that their reports may be reviewed. During the interview process, the interviewers will ask questions they may have for the applicant. The interview process also gives the applicant the opportunity to give an explanation for any items a Commission member may have concerns about. After the interview, the Commission member(s) will make a recommendation to the full Commission later in open session for the purposes of awarding, denying, or possibly recommending additional educational courses for the applicant. In almost all cases, the full Commission approves this recommendation.

When a complaint is turned in, Ms. Moore typically requests a response

from the respondent. Upon receipt of the response, both are forwarded to the department's legal office. Ms. Christy Allen, Attorney for the Real Estate Appraiser Commission, initially reviews the complaint and response, often, the complaint is referred to a Commission member in order that they may review the file. After a Commission member has reviewed a complaint file, there are several options which are possible.

One option is to recommend a formal hearing. This process involves the individual being brought in for a formal hearing with an administrative judge presiding over the case and the Commission members – other than the Commission member who reviewed the file – acting as the jurors. Typically, an appraiser will have legal representation and Ms. Allen will act as the state's attorney or the prosecutor. After hearing the case and acting as the jurors, the sitting Commission members make a final decision on the case. Typically, cases that reach this point are serious in nature and may warrant revocation, suspension, or restriction.

Another option available to the reviewing Commission member is to recommend an informal conference. An individual is brought in for an informal conference with Ms. Allen and the Commission member who reviewed the file, will ask questions concerning the matter and make recommendations. For remedial action a warning may be issued to the respondent. These cases are generally less serious in nature or are a first-time offense. The purpose of the informal hearing is to give the Commission member an opportunity to ask questions and clarify any concerns they may have. This also gives the respondent an opportunity to express themselves and explain their position. This informal conference can end with a letter of warning, a required or recommended educational offering, recommendation for a formal hearing, or no further action. The vast

majority of all cases heard by Commission members are resolved by an informal conference.

The third possibility is that after hearing the complaint, the Commission member decides that the complaint has no merit and it is recommended that the file be closed. This situation is rare; however, it does occur.

Ms. Allen mandates that no case be discussed among Commission members. This is in the event a formal hearing is conducted. The Commission members act as jurors and should not be prejudiced or influenced by any opinions or information concerning a given case. Therefore, while a complaint is under investigation by a Commission member, other Commission members will have no knowledge of who the respondent is or the nature of the complaint and, may indeed, never know of the complaint depending on how the case is handled; i.e., formal or dismissed. This process is the same process followed by other boards and commissions.

It is the goal of the commission to resolve all complaints within a one-year period, and this is generally the case. Some cases run longer than this due to the complexity of the case.

In this issue:



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Manufactured Housing

The following articles were produced by Ric Wilson of the Georgia Real Estate Appraisers Board. There have been numerous inquiries in our state regarding the subject of manufactured housing appraisals. The Tennessee Real Estate Appraiser Commission has received the material published by the Georgia Board and agreed unanimously with their views. We appreciate the Georgia Board for letting us share this information.

Appraising Manufactured Housing By Ric Wilson Georgia Real Estate Appraiser Board

Recently the Board received a number of telephone calls from lenders and from appraisers asking about a new Georgia law prohibiting appraisals on manufactured housing. **THERE IS NO SUCH LAW!**

Apparently someone started the rumor in the wake of disciplinary action that the Board has taken against appraisers who produced appraisals of manufactured housing without following accepted appraisal practices or USPAP.

The Board has received some reports that the mistake made by those appraisers has been made by other appraisers who have attempted to appraise manufactured housing. The mistake was to attempt to perform the sales comparison approach with "manufactured comparables."

Specifically, the appraisers attempted to pass off as comparable sales, dealer-financed purchases of new manufactured homes and lot combinations. There are severe problems with attempting to use these transactions as comparables.

A major problem was that the "comparables" did not constitute open market sales transactions of real estate. Instead of market sales prices, the appraisers used the total of a) the dealer-financed price for a manufactured home based upon plans and specifications, b) the sales tax, and c) an agreed upon price for the lot. The appraisers' sources of information were HUD-1 closing statements of the purchase of the unattached manufactured homes.

An additional problem was that many of the transactions were not actual real estate transactions. Since the dealers sold the land under land contracts, no title to the land passed at the time of the "sale." Moreover, if the dealers also continued to hold title to the manufactured homes, they were titled as personal property. The Georgia Supreme Court has held that the mere placing of a manufactured home on land and hooking it up to utilities does not make the home real estate. It is not the

physical attachment of the manufactured home, but the legal attachment that makes it real estate. Therefore, there was no real estate sale to serve as a comparable. In short since true comparables only arise out of open market, arms length sales of real estate, these "manufactured comparables" do not qualify.

Nevertheless, appraisals of manufactured homes can be done and are being done in accord with standard appraisal principles and practices and in compliance with USPAP. If you have an assignment to develop an appraisal of a manufactured home and your client requires you to do the sales comparison analysis, do the work necessary to find real comparables.

Despite some opinions to the contrary they do exist. One of the appraisers facing disciplinary action complained that he could not find real comparables. Yet another appraiser reviewing one of his appraisals found five comparables for the subject property in that appraisal.

FANNIE MAE GUIDELINES
Fannie Mae, formerly known as the Federal National Mortgage Association, has criteria appraisers must follow in performing assignments involving manufactured homes. Appraisers would do well to keep these criteria in mind for all appraisals involving manufactured homes.

Definition

The Fannie Mae criteria define manufactured housing units as "single-width or multi-width units that are constructed off-site and then transported to their permanent site where they are completed and/or attached to foundation." Each manufactured housing unit must have all wheels, axles, and trailer hitches removed; be permanently attached to a foundation; and be legally classified as real estate. The criteria apply either to conventional "mobile homes" or to prefabricated or modular homes. Prefabricated or modular housing must meet local zoning and building codes. Mobile homes may also have to meet local standards, but they must meet the Federal Home Construction and Safety Standards established by HUD in June, 1976.

Physical Requirements

No specific Fannie Mae square footage minimums apply to manufactured housing. Each living unit must be of a sufficient size and have room dimensions that would be acceptable to the typical purchaser in the subject market area. An engineer must have designed the permanent foundation system. Whether the foundation consists of piers or is a perimeter foundation, the footings must extend below the frost line.

Marketability

In the appraisal of manufactured housing unit, the appraiser must address its marketability in the subject market area by commenting on:

- the adequacy of the size of the unit's living area, including room size and storage capacity;
- the roof pitch and overhangs and the compatibility of the exterior finish; and
- The marketability and general value of manufactured homes in the subject market area in comparison to the marketability and values of site-built housing in the same market area.

Location of Manufactured Housing Units

Single-width units must be located in a Fannie Mae approved project. Multi-width units may be located on individual lots or in a project. For individual lots, some Fannie Mae regional offices require subdivision approval of the project.

Comparable Sales

As always, market sales are key. The components that determine a market sale are the same as those that generally determine market value. First, the buyer and seller are motivated and well informed or well advised and acting in his or her best interest. Second, the property for sale is exposed in the open market for a reasonable amount of time. Third, a transfer of title to real estate occurs.

Where market sales are available, appraisers should use comparable sales of similar manufactured housing units. Single-width units should be compared with single-width units and multi-width units with multi-width units. Only when market sales of manufactured units are not available should appraisers consider using site-built units as comparable sales. If an appraiser determines that it is necessary to use sales of site-built units as comparables, the appraiser must explain the use of such sales. In addition, if there is a preference in the subject market for site-built housing, the appraiser must make appropriate adjustments to the site-built sales.

Likewise, if the subject property is modular or prefabricated housing, the appraiser should use market sales of similar modular or prefabricated housing. Again, only if market sales of similar housing units are not available should the appraiser use sales of site-built housing as comparable sales and then only if the appraiser explains the use of such sales and makes appropriate adjustments for marketability in the subject market area.

While these criteria are specific Fannie Mae requirements, they represent sound appraisal principles to consider in performing any appraisal of manufactured housing for any client.

USPAP Q&A

Question:

I note that some of the Certification sections of USPAP have been changed in the 2001 edition. Can you tell me what has changed?

Response:

The following summarizes the most significant changes to the Certifications in SRs 2-3, 3-2(f), 5-3, 8-3 and 10-3. SRs 2-5, 8-5 and 10-5 were all removed and their requirements moved into the Comment section of SRs 2-3, 3-2(f), 5-3, 8-3 and 10-3. An emphasis was added on the requirement to sign a Certification, not a report, and language was also added requiring that "An appraiser who signs any part of the appraisal report, including a letter of transmittal, must also sign this certification." The requirement to name individuals providing "significant professional assistance" was changed to "significant real property appraisal assistance" for SR 2-3, with similar discipline-specific references to the other Certifications in SRs 3-2(f), 8-3 and 10-3. In addition, although it is not required that the description of such assistance be contained in the Certification, disclosure of their assistance is required in accordance with new changes to the applicable reporting requirements for these standards - for example, SR 2-2(a), (b), or (c)(vii), as applicable, for real property. Comment: A signed certification is an integral part of the appraisal report. An appraiser who signs any part of the appraisal report, including a letter of transmittal, must also sign this certification. Any appraiser(s) who signs a certification accepts full responsibility for all elements of the certification, for the assignment results, and for the contents of the appraisal report. When a signing appraiser(s) has relied on work done by others who do not sign the certification, the signing appraiser is responsible for the decision to rely on their work. The signing appraiser(s) is required to have a reasonable basis for believing that those individuals performing the work are competent and that their work is credible.³⁴ The names of individuals providing significant real property appraisal assistance who do not sign a certification must be stated in the certification. It is not required that the description of their assistance be

contained in the certification, but disclosure of their assistance is required in accordance with SR.2-2(a), (b), or (c)(vii), as applicable.

Question:

A client has asked me to develop an appraisal. I am not under any obligation by law or regulation, or by agreement with the client, to comply with USPAP for this particular assignment, but I would like to do so. Is this possible?

Response:

Yes, you can voluntarily choose to perform an assignment under USPAP. The ETHICS RULE states "Compliance with these standards is required when either the service or the appraiser is obligated by law or regulation, or by agreement with the client or intended users, to comply. Compliance is also required when an individual, by choice, represents that he or she is performing the service as an appraiser."

Question:

A client feels his property is over assessed by the County. He's asked me to perform a tax consulting service that involves advocacy for his position and I'd like to charge him on a contingency fee basis. This assignment would not include an appraisal. I have two questions:

Is this service allowed under USPAP? If not, can I perform this assignment outside of USPAP?

Response:

(1) You cannot perform this assignment under USPAP. An appraiser, in appraisal practice, cannot be an advocate. The ETHICS RULE states "In appraisal practice, an appraiser must not perform as an advocate for any party or issue. Comment: An appraiser may be an advocate only in support of his or her assignment results. Advocacy in any other form in appraisal practice is a violation of the ETHICS RULE." Appraisal practice is defined in USPAP as "valuation services including, but not limited to, appraisal, appraisal review, or appraisal consulting, performed by an individual as an appraiser." Furthermore, none of the certifications in USPAP allow any bias, contingent compensation, or direction in value that favors the cause of the client. (2) Absent any law or regulation to the contrary, you may complete this assignment outside of USPAP, as long as you are very clear about your role. The ETHICS RULE also states "An appraiser must not misrepresent his or her role when providing valuation services that are outside of appraisal practice."

Question:

I was told that, because SR 2-5 was eliminated from the USPAP in 2001, a

supervisor or employer who signs a report is no longer as responsible as the individual preparing the appraisal and that using a conditional label next to the signature of the supervisor or employer exempts that individual from adherence to USPAP. Is this true?

Response:

No, it is not true, if the supervisor or employer is an appraiser. The references to "supervisor" and "employer" were removed; however, the new language added to the Comment to SR 2-3 (as well as similar language added to SR 3-2, 8-3 and 10-3) specifically requires that "An appraiser who signs any part of the appraisal report, including a letter of transmittal, must also sign this certification." It further states "Any appraiser(s) who signs a certification accepts full responsibility for all elements of the certification, for the assignment results, and for the contents of the appraisal report."

Question:

I am performing a review of a real property appraisal and my client has asked me to give my opinion of value, even if I agree with the value in the appraisal. Does my concurrence constitute an appraisal opinion? If so, what do I need to do to comply with USPAP?

Response:

Yes, if you concur with the value in the report, it does constitute an appraisal by the reviewer. **SR 3-1 (a) states: "If the purpose of the assignment includes the reviewer developing his or her own opinion of value about the subject property of the work under review, that opinion is an appraisal whether it: concurs with the opinion of value in the work under review, as of the date of value in that work or a different date of value; or differs from the opinion of value in the work under review, as of the date of value in that work or a different date of value."** You should be careful to be sure that your scope of work clearly includes the requirement to develop your own opinion of value (i.e. an appraisal). The Comment to SR 3-1 (c) shows the steps that must be taken when the purpose of an appraisal review includes the reviewer expressing his or her own opinion of value. One of these requirements is that you must satisfy Standard 1 (or Standard 7 for a personal property appraisal review). Specifically, whether you concur or disagree with the value in the appraisal being reviewed, you would extend to your development process those items in that appraisal that you conclude are credible and in compliance with Standard 1 in this case. This is accomplished on the basis of an extraordinary assumption. Those items not deemed to be credible or in compliance must be replaced with information or analysis by

the reviewer. Additional advice is contained in Advisory Opinion 20, "An Appraisal Review Assignment that Includes the Reviewer's Own Opinion of Value".

Question :

A client has asked me to perform a review appraisal on a restricted use appraisal report. Can I do this and comply with USPAP?

Response:

Yes, you can. However, in order to comply with USPAP, the review appraiser must have access to the original appraiser's work file. The extremely brief reporting nature of many restricted use appraisal reports makes reviewing these reports feasible only if the workfile is also available. The 2001 USPAP states at SR 2-2 (c)(ix); "...The review of a Restricted Use Appraisal Report in compliance with STANDARD 3 is not possible without the reviewer having benefit of the information retained in the workfile." Therefore, the appraiser performing the review must gain access to the file in order to accept such an assignment.

Question:

If a home has sold more than once in the past year, am I required to analyze all of the sales, or just ownership is due to a foreclosure, or is between family members or other related parties?

Response:

Advisory Opinion 1 (AO-1) addresses the appraiser's obligations with respect to prior sales of the subject. It states in part: "USPAP Standards Rules 1-5(a) and (b) require an appraiser to analyze (1) any current Agreement of Sale, option, or listing of the property being appraised, if such information is available to the appraiser in the normal course of business, and (2) any prior sales of the property being appraised that occurred within one year for a one-to-four family residential property or within three years for all other property types. In any case, USPAP Standards Rules 2-2(a)(ix), (b)(ix), and (c)(ix) call for the written appraisal report to contain sufficient information to indicate compliance with the sales history requirement. Standards Rules 2-2(a)(ix), (b)(ix), and (c)(ix) further require that, if sales history information is unobtainable, the written appraisal report must include a commentary on the efforts taken by the appraiser to obtain the information." Therefore, you must report and analyze **all** of the sales, not just the most recent one. This would also include **any** type of sale, whether it was arm's length or not. If a sale was between family members, or otherwise related parties, or involved a

foreclosure, the appraiser is still obligated to report it and analyze it. In addition, if sales, listings, etc. from prior periods (i.e. beyond the one or three year periods) are known and considered relevant to the appraisal of the subject property, they should also be reported and analyzed.

Question:

It is my understanding that lenders are required to provide borrowers with a copy of the appraisal performed in conjunction with their loan if the borrower requests the appraisal in writing within a certain time frame. Does this requirement mean that borrowers are also intended users of the appraisal report?

Response:

No, the fact that a borrower or anyone else receives a copy of the appraisal report does not make them an intended user. The concept of an "intended user" in USPAP is framed within the context of the appraiser-client relationship. An "intended user" is defined as follows: *the client and any other party as identified, by name or type, as users of the appraisal, appraisal review, or appraisal consulting report, by the appraiser on the basis of communication with the client at the time of the assignment.* There are several things to note in this definition. First, intended users of the appraisal report must be identified by the client. Secondly, this identification is made at the time of the engagement process so the appraiser can make a prudent judgment about the scope of work to apply in the assignment and the level of detail to include in the report. It is also worth noting that the concept of "intended use" and "intended users" are related to the purpose of the assignment. Appraisals reports for loan transactions are typically used to substantiate real property value as underlying collateral for a particular loan. The fact that the lending institution is required by law or regulation to make certain disclosures, to the borrower about the loan and the basis for the loan decision, does not alter the purpose, the intended use or the intended users of the appraisal assignment. Statement on Appraisal Standards No. 9 further clarifies this issue by stating, *A party receiving a report copy from the client does not, as a consequence, become a party to the appraiser-client relationship. Parties who receive a copy of an appraisal, appraisal review, or appraisal consulting report as a consequence of disclosure requirements applicable to an appraiser's client do not become intended users of the report unless the client specifically identifies them at the time of the assignment.*

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Important - Rules Changes

Licensure and Renewal Fees Have Increased

The fees for all licensee renewals have

increased. Fees are now \$400 (includes \$50 federal registry fee). If either payment or continuing education is not submitted thirty days prior to the expiration date, a late fee is imposed (remains \$100). A late renewal may be issued up to six (6) months.

Trainee renewals have also increased from \$50 to \$125. Renewals received after the thirty-day window prior to the expiration date will be charged a late fee. A notarized renewal form and the fee must be obtained in order to avoid a late fee of \$100. No late renewals may be processed after six (6) months of the expiration date.

Initial fees for trainees and licensees have also increased. The trainee application and fees for an initial registration increases to \$125. The fee covers a two-year period. The license application fee has also increased from \$100 to \$125. The new licensure fees have increased to \$400 for a two-year period. This increased fee will also apply to those who have applied for licensure prior to the fee change.

Eligibility for Trainee Property Inspections Has Changed

Trainees who have registered prior to the rule change may continue to go on property inspections if the supervisory sponsor deems that the trainee has the appraisal experience and competency to do so. Any trainee applicant registering at this time must have a proper affidavit submitted to the Commission prior to obtaining this authority. If you have recently registered as a trainee but have not received notification from the Commission office of this requirement, you do not fall within this category.

Any trainee registering for the first time must have at least 500 hours of experience before going on inspections without the supervising appraiser. Upon a new trainee registration, a property inspection affidavit will be sent to the

trainee. The sponsor and trainee must sign and submit the affidavit at such time as the trainee reaches the 500-hour experience requirement. Only at this time will our record reflect this authorization for solo inspections.

Upon obtaining the 500 hours of experience, it is recommended that trainees meet with the Commission to discuss their experience. To schedule an interview, you may submit a request, in writing, along with an experience log listing appraisals of at least 500 hours' accumulation. Appraisals will be chosen from that log for review. An interview will then be scheduled for the next available meeting. The purpose of this interview would be for comments and guidance to the trainee.

Trainee Sponsors Must Meet Two-Year Certification Requirement

A licensee must now be certified for a minimum for two years prior to sponsoring trainees. This will not affect licensees with trainees who have already been approved.

ADDRESS CHANGES

Some licensees and trainees are not appropriately notifying the Commission office of address changes. Any change of residence, business, or mailing address should be submitted to the Commission office within thirty (30) days of that change. Changes may be made on a form provided by the Commission or may otherwise be submitted in writing.

There is a \$25 fee for a licensee address change. Each licensee within an office is required to submit the \$25 fee.

There is no fee to make this change for registered trainees. However, a "change of sponsor" form is not sufficient in itself to effect this change. Please use the "change of information" form or submit in writing the complete information as to what addresses are changed.

Appraisal Subcommittee

Conducts Field Review

The Appraisal Subcommittee visited the Commission office and attended a Commission meeting in December 2000 for a routine field review.

The Tennessee Real Estate Appraiser Commission was commended on the interview process as a method of guidance and instruction to the applicants.

The overall operation of our appraisal licensing program was positive, and we thank Vicki Ledbetter and Dennis Greene of the Subcommittee for an informative visit. The only negative comments made by the Subcommittee in its report were in regard to temporary practice. Legislation has now passed which will enable the Commission to adopt rules to better facilitate the temporary practice program.

Incoming Mail Is Often Delayed

Mail which is sent to our office is not always received in a timely manner. At times, mail may not arrive until two-three weeks after the postmarked date. In addition, if there is a fee involved and money is attached to an application, the money must go through our cashier's office prior to being processed.

Any application or other communication which requires immediate attention should be sent via Federal Express. That service delivers directly to our office. Even then if a fee is involved, the documentation must be sent to the cashier's office prior to any initial processing by our office.

The Department of Commerce and Insurance is aware of this problem and will be working in the future to enhance our on-line status and provide more efficient service to our licensees, especially in the area of renewals.

Commission Staff Undergoes Transitions

The Commission staff has changed on numerous occasions throughout the past four years. Our new staff consists of Chelsey Luke, Administrative Assistant; Darlene Hendrix, Administrative Assistant; and Pam Adams, Licensing Technician. On the next page is a questionnaire, which we encourage you to complete at any opportunity you have to communicate with me or anyone on the staff. Please remember that while our staff is new, our goal remains that we be responsive to you.

Your assistance will be appreciated by completing the form when applicable and submitting it to us. We welcome both negative and positive comments.

Disciplinary Action

December, 2000

Frank Paschall, CR – 768

Trenton, TN 38382

Violation: T.C.A. 62-39-329

Consent Order: Course in Report Writing and Uniform Standards of Professional Appraisal Practice.

January 2001

Bobby Gibson, CR-795

Chattanooga, TN 37416

Violation: T.C.A. 62-39-329

Consent Order: Course in Procedures and Uniform Standards of Professional Appraisal Practice.

Alicia Templeton, CR-1905

Jackson, TN 38302

Violation: T.C.A. 62-39-329

Consent Order: Course in Report Writing and Uniform Standards of Professional Appraisal Practice.

For a Complete Set of the
New Rules, Please Refer To
our WEB Page.

www.state.tn.us/commerce/treac



Comments or Questions?

Contact Our Office:

Phone: (615) 741-1831

Fax: (615) 253-1692

Current Number of Active Licensees – By Classification

Certified General Real Estate Appraisers

568

Certified Residential Real Estate
Appraisers

705

Licensed Real Estate Appraisers

177

Registered Trainee

468

The Tennessee Real Estate Appraiser Commission is looking for input on our newsletter. If there are any topics you would like to see published in future newsletters please contact me at (615) 741-1831.

Our goal is to provide you with current up-to-date information. If you feel that certain topics are being overlooked, we would appreciate these being brought to our attention.

Chelsey Luke

Public Forum to be Held in June

On June 18, 2001, the first of three public forums will be held. This session will be held at 10:00 a.m. in Room 160, Davy Crockett Tower, Nashville. All individuals are invited to attend and present any questions or concerns to the Commission members. Some topics the Commission on which the Commission would appreciate input are: 1) should there be a specific number of trainees allowed under one sponsor, 2) should there be specific training for potential trainee sponsors, 3) are the seminars and courses given by the course providers offering adequate education, 4) what do you expect from this Commission, etc.

At 1:00 p.m. on that day, a four-hour session will be held on laws and rules of the Commission. **Four (4) hours of continuing education will be given to licensees who attend.** You must register preferably via fax. Only about fifty (50) individuals will be accepted for this initial forum.

Other forums will be held within the next few months. At least one forum is scheduled in each grand division of the state. While no definitive dates have been established in East or West Tennessee, if you live in these areas, you may wish to attend a future meeting at that time. It is also suggested that for the initial forum that only licensees attend. Other forums will be scheduled in the future based on interest. Please complete and return via fax to (615) 253-1692.

Name of Licensee

License/Certificate Number

Business Name

Address

Phone Number

Tennessee Real Estate Appraiser Commission
500 James Robertson Parkway
Suite 620
Nashville, TN 37243-1166

**Tennessee Department of Commerce
and Insurance**
**Tennessee Real Estate Appraiser
Report is published by the Tennessee
Real Estate Appraiser Commission**

Members of the Commission:

Gary Standifer, Chairman
Brentwood

Robert Sain, Vice Chairman
Bolivar

William Blackburn, Appraiser Member
Morristown

Paul Sampson, Appraiser Member
Johnson City

Donald Turner, Appraiser Member
Nashville

Polly A. Dyer, Appraiser Member
Bon Aqua

STAFF MEMBERS

Sandra S. Moore
Administrative Director

Chelsey Luke
Administrative Assistant RB1

Darlene Hendrix
Administrative Assistant RB1

Pamela Adams
Licensing Technician

**Commission Meeting Dates for
2001**

May 21	Room 640
June 18	Room 640
July 16	Room 640
August 20	Room 640
September 17	Room 640
October 15	Room 640
November 12	Room 640
December 10	Room 640

Unless otherwise noted, the Commission meetings are scheduled to be held at 500 James Robertson Parkway, Nashville, Tennessee. Meetings start at 9:00am. The public is invited to attend. Please call the Commission office to verify that the meeting will be held on the date scheduled.

“The Tennessee Department of Commerce and Insurance is committed to principles of equal opportunity, equal access, and affirmative action.” Contact the EEO Coordinator or ADA Coordinator (615) 741-0481, for TDD (615) 741-7190

TENNESSEE DEPARTMENT OF COMMERCE AND INSURANCE AUTHORIZATION NO. 335203 Revised January 2000. This public document was promulgated for 2,500 copies per issue, at a cost of 24 cents per copy.

